

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HUAWEI TECHNOLOGIES CO., LTD., et al.,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

SAMSUNG ELECTRONICS CO., LTD. &
SAMSUNG ELECTRONICS AMERICA, INC.,

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO., LTD.,
HUAWEI DEVICE USA, INC., HUAWEI
TECHNOLOGIES USA, INC., & HISILICON
TECHNOLOGIES CO., LTD.,

Counterclaim-Defendants.

CASE NO. 16-cv-02787-WHO

**DECLARATION OF PAULA
PHILLIPS IN SUPPORT OF
SAMSUNG'S ADMINISTRATIVE
MOTIONS TO FILE UNDER SEAL**

[Dkt. 333 and 369]

1 I, PAULA PHILLIPS, declare as follows:

2 1. I am currently employed as Legal Administrator at AT&T Services, Inc.. Except as
3 otherwise indicated, I have personal knowledge of the facts stated herein and, if called as a witness,
4 could and would testify thereto.

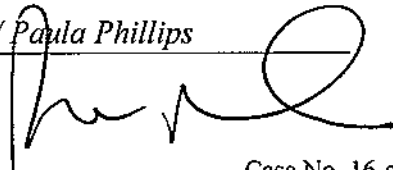
5 2. Pursuant to Civil L.R. 7-11 and 79-5, I make this declaration in support of Samsung's
6 Administrative Motion to File Under Seal Portions of Its Motion for Summary Judgment and
7 Exhibits Thereto (Dkt. 333) and Samsung's Administrative Motion to File Under Seal Portions of
8 Reply in Support of Samsung's Motion for Summary Judgment and Exhibits Thereto (Dkt. 369) in
9 the above-captioned matter.

10 3. I have reviewed the portions of Exhibit O to the Declaration of Brian Mack in
11 Support of Samsung's Motion for Summary Judgment ("Exhibit O") and the Reply in Support of
12 Samsung's Motion for Summary Judgment ("Reply") that contain or suggest AT&T confidential
13 information.

14 4. Exhibit O describes highly confidential information about AT&T's LTE wireless
15 communication network. AT&T does not disclose this information to the public and only made it
16 available in the above-captioned matter under the designation "HIGHLY CONFIDENTIAL
17 ATTORNEYS EYES ONLY" pursuant to the applicable Protective Order. Disclosure of this
18 information to the public could result in substantial harm to AT&T's competitive standing by giving
19 AT&T's competitors insight into AT&T's LTE wireless communication network without AT&T
20 having such insight in return.

21 5. The purple highlighted portions on pages 10 and 11 of the Reply discuss highly
22 confidential information from Exhibit O. For the same reasons given in the preceding paragraph,
23 disclosure of this information to the public would harm AT&T's competitive standing.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct. Executed August 23, 2018, in Bedminster, New Jersey.

26
27 /s/ Paula Phillips
28 

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), the undersigned attests that concurrence in the filing of this Declaration has been obtained from Paula Phillips.

The undersigned has agreed to file this Declaration as a courtesy to third-party AT&T Services, Inc. For the avoidance of doubt, Quinn Emanuel Urquhart & Sullivan, LLP does not represent AT&T Services, Inc. or Ms. Phillips. Assistance in the filing of this Declaration does not in any way establish an attorney-client relationship.

/s/ Victoria F. Maroulis

Victoria F. Maroulis

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